

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and )	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated, )	
Plaintiff, )	Honorable Aleta A. Trauger
vs. )	DECLARATION OF WILLOW E.
CORRECTIONS CORPORATION OF )	RADCLIFFE IN SUPPORT OF REPLY IN
AMERICA, et al., )	SUPPORT OF PLAINTIFF'S MOTION TO
Defendants. )	EXCLUDE EXPERT TESTIMONY OF
	JUSTIN MARLOWE
	<b>[FILED UNDER SEAL]</b>

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I, WILLOW E. RADCLIFFE, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California and am admitted *pro hac vice* before this Court. I am a member of the law firm Robbins Geller Rudman & Dowd LLP, Lead Counsel for Lead Plaintiff and Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund in the above-captioned action. This Declaration is made in support of Reply in Support of Plaintiff's Motion to Exclude Expert Testimony of Justin Marlowe. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached is a true and correct copy of the following exhibit:

Exhibit 13: Excerpt of deposition transcript of William Dalius, dated February 26, 2020  
**[FILED UNDER SEAL]**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 19, 2021, at San Francisco, California.

\_\_\_\_\_  
s/ Willow E. Radcliffe  
WILLOW E. RADCLIFFE

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on February 19, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Willow E. Radcliffe  
WILLOW E. RADCLIFFE

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